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*Attorneys for State Farm Mutual Automobile Insurance  
Company and its affiliates and subsidiaries*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION and PACIFIC  
GAS & ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and  
Electric Company
- ☒ Affects both Debtors

*\* All papers shall be filed in the Lead  
Case, No. 19-30088 (DM).*

Case No. 19-30088 (DM)  
Chapter 11  
Jointly Administered

**STATE FARM'S LIMITED OBJECTION  
TO OFFICIAL COMMITTEE OF  
TORT CLAIMANTS' MOTION  
PURSUANT TO 11 U.S.C. §§ 105(a), 501  
AND FED. R. BANKR. P. 3001(a),  
3003(c), 5005 AND 9007 FOR ENTRY OF  
AN ORDER (I) ESTABLISHING A BAR  
DATE FOR FILING FIRE CLAIMS,  
(II) APPROVING THE FORM AND  
PROCEDURES FOR NOTICE OF THE  
BAR DATE FOR FIRE CLAIMS, AND  
(III) APPROVING SUPPLEMENTAL  
PROCEDURES FOR NOTICE OF THE  
BAR DATE TO FIRE CLAIMANTS**

**Hearing Date and Time:** June 26, 2019 at 9:30  
a.m. (PT)  
**Hearing Location:** 450 Golden Gate Ave., San  
Francisco, CA, Courtroom 17  
**Judge:** Hon. Dennis Montali  
**Related Docket Nos:** 2297, 2298, 2299

1 State Farm Mutual Automobile Insurance Company and its affiliates and subsidiaries  
2 (collectively, “State Farm”), as creditors and parties in interest in the above-captioned chapter 11  
3 cases of Pacific Gas and Electric Company (the “Utility”) and PG&E Corporation (“PG&E” and,  
4 together with the Utility, the “Debtors”), by and through its undersigned counsel, hereby file this  
5 limited objection (the “Objection”) to the *Motion of the Official Committee of Tort Claimants*  
6 *Pursuant to 11 U.S.C. §§ 105(a), 501 and Fed. R. Bankr. P. 3001(a), 3003(c)(3), 5005 and 9007*  
7 *for Entry of an Order (I) Establishing a Bar Date for Filing Fire Claims, (II) Approving the Form*  
8 *and Procedures for Notice of the Bar Date for Fire Claims, and (III) Approving Supplemental*  
9 *Procedures for Notice of the Bar Date to Fire Claimants* (the “TCC” and “Motion,” respectively)  
10 [ECF No. 2297].<sup>1</sup> In support of the Objection, State Farm respectfully sets forth and represents as  
11 follows:  
12

### 13 LIMITED OBJECTION

14  
15 State Farm is one of the largest property and casualty insurers in the State of California  
16 and is believed to be the insurer holding the most insurance subrogation claims against the  
17 Debtors. State Farm’s claims are expected to be in the billions of dollars.

18 Except as set forth herein, State Farm takes no position on the Motion. State Farm files  
19 this Limited Objection because the TCC’s Notice Program contemplates that “the TCC could use  
20 subpoenas to procure information from insurance carriers.” *See Memorandum of Points and*  
21 *Authorities in Support of Motion of the Official Committee of Tort Claimants for Entry of an*  
22 *Order (I) Establishing a Bar Date for Filing Fire Claims, (II) Approving the Form and*  
23 *Procedures for Notice of the Bar Date for Fire Claims, and (III) Approving Supplemental*  
24 *Procedures for Notice of the Bar Date to Fire Claimants* [ECF No. 2298] at p. 9; *Declaration of*  
25  
26  
27

28 <sup>1</sup> Each capitalized term used but not defined herein shall have the meaning ascribed to it in the Motion.

1 *Steven Weisbrot in Support of Motion of the Official Committee of Tort Claimants for Entry of an*  
2 *Order (I) Establishing a Bar Date for Filing Fire Claims, (II) Approving the Form and*  
3 *Procedures for Notice of the Bar Date for Fire Claims, and (III) Approving Supplemental*  
4 *Procedures for Notice of the Bar Date to Fire Claimants* [ECF No. 2299] at p. 21.

5  
6 Should the Court grant the Motion, the approval order should clarify that it does not pre-  
7 judge the appropriateness of any subpoena issued by, or on behalf of the TCC thereunder, nor  
8 does it affect in any way any rights of the subpoena's target to oppose it, or otherwise move to  
9 quash on any available ground under the Federal Rules of Evidence, Federal Rules of Civil or  
10 Bankruptcy Procedure, or applicable law. Stated differently, the entry of an order proposed by the  
11 TCC should not predetermine the propriety of any subpoena later issued by the TCC.

12 **RESERVATION OF RIGHTS**

13  
14 State Farm reserves the right to raise further and other objections to the Motion at the  
15 hearing as may be necessary or appropriate.

16 DATED: June 19, 2019

17 /s/ Shmuel Vasser

18 Allan S. Brilliant (*pro hac vice*)

19 Shmuel Vasser (*pro hac vice*)

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26 *Insurance Company and its affiliates and*  
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